

Exhibit B

STATE OF TEXAS }
 }
COUNTY OF DALLAS }

In re Travis Treviño Runnels

AFFIDAVIT OF NANCY TAYLOR

NANCY TAYLOR, being first duly sworn, appeared before the undersigned authority duly designated to administer oaths and states as follows:

1. My name is Nancy Taylor. I am over the age of 18 and otherwise competent to give this affidavit.
2. Travis Treviño Runnels is my son.
3. I have worked in retirement homes caring for elderly people for over 25 years.
4. I attended James Madison High School for my freshman year. The city of Dallas started integrating schools around 1972, when I became a sophomore. This is when I started attending Samuel High School.
5. I met Travis' father, Noel Runnels, when I was a sophomore in high school. I was 17 years old. I became pregnant with Travis' older brother, Darmonica, in the 11th grade. I never graduated because I dropped out of school after I became pregnant.
6. Darmonica was born when I was 18 years old. Noel and I got married in 1972, shortly before Darmonica was born.
7. After Noel and I got married, we moved into an apartment together. I suspected that Noel was cheating on me, so I eventually moved back in with my parents. Noel and I divorced around 1975.
8. After our divorce, I became pregnant with Travis. When Travis was born, Noel and I moved back in together again. Though we were not married, we stayed together for about ten years after Travis was born. We lived together off and on during those years. Darmonica and Travis spent their early childhood going back and forth between me and Noel.
9. Travis was just a funny, happy-going kid. He was always laughing. That's how I remember him: laughing or smiling. Even when I would get mad and yell at him, he would give me this big smile.
10. As a child, Travis did not talk right. He would speak so fast sometimes, like he was tongue-tied. He would speak so fast that sometimes I could not understand him. I would tell him to slow down or to repeat himself.

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11. Travis would do funny things, like run into the wall when he was little. He would be walking, looking straight in front of him, and then he would just hit the wall head-on. He was always running into things. He was probably about 10 years old when he would do this.
12. Travis never did well in school. I guess he was just fooling around, trying to make the other kids laugh, instead of trying to learn. I don't remember meeting with any of Travis' teachers. I remember thinking that maybe Travis was dyslexic.
13. Travis did not know how to follow directions. If I told him to take out the trash, or to clean his room, he wouldn't do it. He would say, "I forgot." I would have to remind Travis several times what I had asked him to do. I never really had to do this with Darmonica.
14. When Travis was in elementary school, I remember that he sometimes came home crying because the other kids had picked on him. I told Travis to let the teacher know. I also told Travis to stand up for himself, but Travis did not like to fight.
15. Travis liked to collect comic books growing up. He also enjoyed baseball. Those were his favorite things.
16. Travis was always restless. He could not stay still and concentrate on one thing at a time. He was too hyper. Travis' grandmother once told me that she had to tie Travis to a chair because he would not stay still. He was very active.
17. In the mid-1970's I met a man by the name of Tommy Keith Neal ("Keith"). Keith and I got together after Noel and I separated, right around when Travis was 9 or 10 years old. Keith and I stayed together until Travis was about 15.
18. Travis and I lived with Keith and his parents for a few years. At least once during that time, Keith was incarcerated. Darmonica never lived with Keith but, lived with his father instead.
19. Keith was a controlling and possessive man. He once forced me into the trunk of my car and drove from his parents house to a friend's house with me in the trunk. When we got to his friend's house, Keith opened the trunk. Keith's friend asked, "why is she in the trunk?" and told Keith to get me out. Keith had me get out of the trunk and into the passenger's side. I guess he was just trying to show me he was in control.
20. Keith was very abusive. He used to hit on me all the time. Whenever Travis was around, Travis would try to jump in and protect me. Travis did not like Keith.
21. Keith and I would fight inside my bedroom. Travis would be at the door trying to get in. But Keith would have the door locked whenever he was hitting on me.

22. When Travis was about 15 years old, Keith and I once got into a really bad argument in front of Travis. Keith tied a towel around my neck and started choking me. He also put an elastic band that was for exercising around my neck. At some point, Travis tried to step in and protect me. Keith began to choke Travis with his hands. Travis got loose and ran to a store about a block away. He called the police. Tommy had disconnected the phone because he was not about to have anyone call the police on him.
23. Keith was abusive to his own mother. He would steal his mother's checks and cash them to buy drugs. One time, Keith loaned my car to a friend and, somehow, the car got impounded. Keith's mother had given me the \$800 I needed to take it out of the pound. Keith took the money from me to buy crack. I never did get my car back.
24. I started doing crack because of Keith. One day, he just told me to try it. I never did it before then. I don't think Travis saw whenever I did crack because we were always locked in my bedroom.
25. I used to like to drink. Travis and Darmonica used to make fun of me. There was this public commercial about drinking, and the message was that parents should think about how it was affecting their children. The commercial would say that the parent should watch for when he or she is "losing control." That's what I remember: "losing control." So whenever I was drinking or getting' on the boys, they would tease me so hard. They would say "she's losing control."
26. I used to give Travis and Darmonica whoopings. Sometimes, I would use belts; other times, I would use switches. I would hit them on their legs so it would sting. Most of the time, I just used my fist. I would hit them with my fist on their chest or their back.
27. Travis used to run away from me when I had the belt because I knew what was coming. One time, I had to lock him in the bathroom and beat him with the belt in there so he would not get away. I don't remember what that whooping for, but Travis was about 16 years old. I whooped Travis up until around that age.
28. I met with Kathy, the investigator from Travis' defense team. She came to Dallas and talked to me, my mother, and Darmonica. We met together as a group. The other time I saw her was just before Travis' trial. I think she came with one of Travis' lawyers. She met with me and Darmonica, and we talked over lunch. I don't remember if I met with anyone other than those two times. If Kathy or anyone else would have interviewed me at length about Travis' childhood, I would have told them everything I have stated in this affidavit.
29. I was served with a subpoena right around the time that Travis' trial was to begin. The man who gave me the subpoena also left a subpoena for Darmonica at my house. Darmonica was not living with me at the time.

30. I do not remember when, but Kathy had called and said that we needed to get there as soon as possible. She definitely wanted my mother to be there, and they did offer to fly us up, but my mother doesn't like to fly. So we drove to Amarillo: it was myself, my mother, and Travis' father, Noel.
31. I do not remember what day we got to Amarillo, but we stayed one night in a hotel. At trial, I had to wait outside the courtroom because we could not go inside if we were going to testify. I remember Travis' lawyer talking to my mother outside the courtroom. I never left my mother at the courthouse by herself. Sometimes, I went out to smoke, but that was all. I was with her the whole time.
32. I thought that I would testify at Travis' trial. My mother and I just waited and waited outside the courtroom. Someone – either Kathy or Travis' lawyer – finally told us that they weren't going to be needing us after all. We went home after that.

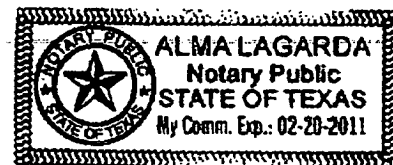
I have read this affidavit and swear upon pain of penalty and perjury that it is true and correct.

Nancy Taylor
Signed

9-17-07
Date

Signed and sworn before me this 17th day of September, 2007.

Alma Lagarda
Notary Public, State of Texas



N.T.